

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA,

Plaintiff,

v.

GEORGE A. NADER,

Defendant.

Case No. 1:18-mj-00196-TCB

**SUPPLEMENTAL MEMORANDUM IN SUPPORT OF MOTION FOR LEGAL
DEFENSE TEAM TO HAVE ACCESS TO DEFENDANT**

Defendant George Aref Nader, by and through the undersigned, respectfully responds to the Court's request for supplemental information submitted to counsel by the Court via electronic mail on June 19, 2019.

This list represents the current individuals Mr. Nader would like access to:

Kathryn Ruemmler
Christopher Clark
Jonathan Su
Timothy McCarten
Jonathan Jeffress
William Zapf
Tom Feeney
Troy Toliver
Emily Voshell
Chantel Christian
Uchenna Anikwe
Clayton LaForge
Savannah Burgoyne
Zachary Williams
Arik Ben-Zvi

Several of the individuals on this list will only visit once or twice and always during visiting hours as instructed by the Alexandria Detention Center. Certain attorneys will visit more frequently throughout the duration of this case, during visiting hours, as instructed by the Alexandria Detention Center. Any experts or other individuals/consultants likely will only visit once or twice during approved visiting hours, but it may be more depending on the needs of the case, and always during approved visiting hours. In the ordinary course, we do not envision more than three visitors at a time, unless the needs of the case necessitate additional visitors and their presence complies with Detention Center rules.

Dated: June 19, 2019

Respectfully submitted,

LATHAM & WATKINS LLP

/s/ Clayton D. LaForge

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*Attorney for Defendant
George Aref Nader*

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of June, 2019, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Jay Prabhu
Laura Fong
Assistant United States Attorney
Justin W. Williams United States Attorney's Building
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Alexandria, VA 22314

/s/ Clayton D. LaForge
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